

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Innovation in the Broadcast Television Bands:) ET Docket No. 10-235
Allocations, Channel Sharing and Improvements)
to VHF)

COMMENTS OF LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

The Los Angeles County Sheriff's Department ("the Department") hereby submits the following comments in response to the Commission's *Notice of Proposed Rulemaking*, FCC 10-196, released November 30, 2010 ("*NPRM*") in the above-captioned proceeding.

The Los Angeles County Sheriff's Department is the largest sheriff's department in the world, with more than 16,000 sworn and professional members. With an annual \$2.4 billion budget, the Department provides law enforcement services to 40 contract cities, 90 unincorporated communities, 9 community colleges, passengers of the Metropolitan Transportation Authority trains and buses, and 47 Superior Courts. The Department is also responsible for housing, feeding, medically treating and securing nearly 20,000 inmates in seven custody facilities.

The Commission is proposing rule modifications to its table of allotments to facilitate a potential "repurposing" of television spectrum for mobile services as suggested in the National Broadband Plan. The intent of these comments in response to the *NPRM* is simply to remind the Commission of the critical public safety communications systems that operate in the 470-512 MHz band (TV channels 14-20) in Los Angeles and other large metropolitan areas. Any

“repurposing” of television spectrum must protect the long-term requirements of public safety agencies to continue operating in the 470-512 MHz band.

Part 90, Subpart L, of the Commission’s rules allocates a total of 18 MHz (TV channels 14, 16, and 20) in the 470-512 MHz band for public safety and other private land mobile radio communications in the Los Angeles metropolitan area. Public safety and other land mobile operations in various portions of 470-512 MHz are also authorized by both rule¹ and waiver² in the New York, San Francisco, Philadelphia, Boston, Washington, Chicago, Miami, Pittsburgh, Dallas, and Houston metropolitan areas. The Commission has also granted Los Angeles County a waiver to permit its use of an additional 6 MHz of spectrum (TV channel 15) as part of a new radio network being deployed by the Los Angeles Regional Interoperable Communications System (“LA-RICS”).³ LA-RICS will consolidate diverse radio systems from across Los Angeles County into a new interoperable platform based on channels in the 470-512 MHz band already licensed to the County, the City of Los Angeles, and other independent cities in the region.

The 470-512 MHz band has long been, and is expected to remain, the principal public safety mobile frequency band in Los Angeles.⁴ A total of 50 law enforcement agencies and fire departments within the County operate their primary public safety communications in the UHF band, primarily in 470-512 MHz. In addition to the Sheriff’s Department (with over 14,600 mobile/portable radios, primarily on channel 16), these agencies include the City of Los Angeles Police Department (with over 11,500 portable and mobile radios), the Los Angeles County Fire

¹ 47 C.F.R. §90.311.

² See, e.g., *Nassau County Police Department*, DA 02-1771, 17 FCC Rcd 14252 (2002).

³ *County of Los Angeles*, California, DA 08-2823, released December 30, 2008.

⁴ *South Bay Regional Public Safety Communications Authority*, 13 FCC Rcd 23781, 23797 (1998).

Department (with over 1,500 portable radios), and several dozen smaller agencies that interoperate on a daily basis with County and City of Los Angeles departments. Additional public safety agencies in the area intend to migrate to the 470-512 MHz band as part of the LA-RICS deployment.⁵

CONCLUSION

As indicted above, there are substantial public safety communications operations in the 470-512 MHz band, with additional interoperable network deployments underway as part of LA-RICS. Therefore, we urge that any long-term planning regarding the “television spectrum” continue to protect critical public safety communications operations in the 470-512 MHz band.

Respectfully submitted,

LOS ANGELES COUNTY SHERIFF’S
DEPARTMENT

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⁵ LA-RICS has also received authority to deploy a broadband system in the 700 MHz spectrum licensed to the Public Safety Spectrum Trust. However, that broadband system will not be able to satisfy public safety requirements for mission-critical voice communications. Furthermore, as discussed by the Commission in *County of Los Angeles, supra*, there are an insufficient number of 700 MHz narrowband channels allotted in Los Angeles County to accommodate county-wide communications requirements.